



2600 Maitland Center Pkwy.  
Suite 300  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL  
32790-0200  
Tel: 407-740-8575  
Fax: 407-740-0613  
www.tminc.com

February 27, 2009  
**Via ECFS**

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36  
Annual 64.2009(e) CPNI Certification for 2008  
WQN, Inc. - Form 499 Filer ID 826768**

Dear Ms. Dortch:

In accordance with the Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. Section 64.2009(e), WQN, Inc. hereby files its Certification of Customer Proprietary Network Information (CPNI) Compliance Certification and supporting Statement.

Please contact me regarding any questions you may have concerning this filing via telephone (470-740-3005) or email ([mbyrnes@tminc.com](mailto:mbyrnes@tminc.com)).

Sincerely,

Monique Byrnes  
Consultant to WQN, Inc.

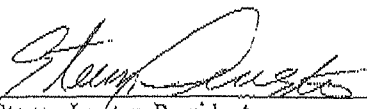
Attachment  
*MB/sp*

cc: FCC Enforcement Bureau (2 copies)  
Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
S. Ivester – WQN  
file: WQN - CPNI  
tms: FCCx0901

Annual 64.2009(e) CPNI Certification for: Calendar Year 2008  
Date Filed: February 27, 2009  
Name of Company covered by this certification: WQN, Inc.  
Form 499 Filer ID: 826768  
Name of Signatory: Steven Ivester  
Title of Signatory: President

I, Steven Ivester, certify and state that:

1. I am the President of WQN, Inc. and, acting as an agent of the company, I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. Section 64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

  
\_\_\_\_\_  
(Steven Ivester, President  
WQN, Inc.

02-27-09  
\_\_\_\_\_  
Date

Attachment A  
Statement of CPNI Procedures and Compliance

**WQN, Inc.**

Calendar Year 2008

**WQN, Inc.**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

WQN, Inc. ("WQN" or "Company") provides local exchange and long distance services via traditional wireline and Voice over Internet Protocol (VoIP) services to residential and business customers. The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If WQN elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

WQN bills its customers directly and has taken steps to secure CPNI and call detail records, and manage the release of such information in accordance with FCC rules. The company has put into place processes to safeguard customer CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

Call detail information is provided over the telephone to customers once the customer provides a 4-digit PIN password to the Company's Service Representative. If the customer cannot provide the password and the customer's question does not fall into the exception where the call detail information is provided by the customer to the Customer Service Representative, then call detail can only be provided by calling the customer at the telephone number of record.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Our website operates off of a 4 digit PIN password that is not readily available using biographical information or account information. Should the customer forget this 4 digit PIN, there is no automated means of retrieval. The customer must contact customer service and pass a series of questions established for the purpose of CPNI validation before the password can be reset and emailed to the email address established on the customer's initial sign up.

WQN, Inc.

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

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The Company does not have retail locations and therefore does not disclose CPNI in-store.

Company notifies customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information) , password changes, change in a response to a back-up means of authentication, change to an on-line account, change or creation of an address of record other than at service initiation.

The Company does have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The company maintains a record of any breaches discovered and notifications made to the USSS and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The Company has not taken any actions against data brokers in the last year.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.